

EPA Reg. No. 75174-8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 23, 2018

Kevin Kutcel
Agent for
SiShield Technologies, Inc.
17 Executive Park Drive, Suite 563
Atlanta, GA 30329

Subject: Notification per PRN 98-10 – New alternate brand name
Product Name: SiS AM 75
EPA Registration Number: 75174-8
Application Date: September 24, 2018
Decision Number: 544743

Dear Mr. Kutcel:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The alternate brand name "Durisan FS75" has been added to the product record.

If you have any questions, you may contact Tara Flint via email at flint.tara@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Miederhoff", is written over a horizontal line.

For
Eric Miederhoff, Product Manager 31
Regulatory Management Branch 1
Antimicrobials Division (7510P)
Office of Pesticide Programs

KRK Consulting LLC

5807 Churchill Way

Medina, OH 44256

Tel: 440-263-7305

E-mail: kevinkutcel@gmail.com

September 24, 2018

US EPA (NOTIF)

Office of Pesticide Programs

Room S-4900, One Potomac Yard

2777 South Crystal Drive

Arlington, VA 22202-4501

Subject: PR Notice 98-10 Notification for Alternate Brand Name
EPA Reg. No. 75174-8
Primary Brand Name: SiS AM 75

Please accept the completed application (Form 8570-1) for the notification for the alternate brand name for EPA Reg. No. 75174-8.

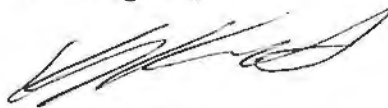
Primary Brand Name: SiS AM 75

Alternate Brand Name: Durisan FS75

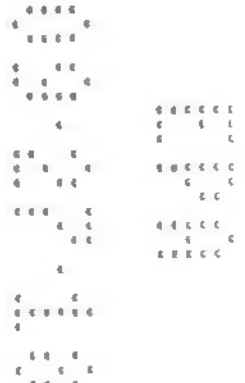
This notification is consistent with the provisions of PR Notice 1998-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand this it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the requirements of PR Notice 98-10 and 40CFR 156.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Your cooperation in processing this notification in an expedient manner is greatly appreciated. Please note that KRK Consulting LLC is the authorized agent for SiShield Technologies Inc. Please call me at 440-263-7305 if you should have any questions.

Best Regards,



Kevin R. Kutcel,
Agent for SiShield Technologies Inc.





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number SiShield Technologies / 75174-8	2. EPA Product Manager Miederhoff	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SiShield Technologies / SIS AM 75	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) SiShield Technologies 17 Executive Park Drive, Suite 563 Atlanta, GA 30329 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Please see cover letter.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1,5.55 gall	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Kevin R. Kutcel	Title Agent	Telephone No. (Include Area Code) 440-263-7305
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Kevin R. Kutcel	5. Date Sep 24, 2018	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 8, 2018

Kevin Kutcel
Agent for
SiShield Technologies, Inc.
17 Executive Park Drive, Suite 563
Atlanta, GA 30329

Subject: Notification per PRN 98-10 – New alternate brand name
Product Name: SIS AM 75
EPA Registration Number: 75174-8
Application Date: December 7, 2018
Decision Number: 536466

Dear Mr. Kutcel:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The alternate brand name "Trisilgard" has been added to the product record.

If you have any questions, you may contact Tara Flint at 703-347-0398 or via email at flint.tara@eepa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Miederhoff", is written over a horizontal line.

For
Eric Miederhoff, Product Manager 31
Regulatory Management Branch 1
Antimicrobials Division (7510P)
Office of Pesticide Programs

KRK Consulting LLC

5807 Churchill Way

Medina, OH 44256

Tel: 440-263-7305

E-mail: kevinkutcel@gmail.com

December 7, 2017

US EPA (NOTIF)

Office of Pesticide Programs

Room S-4900, One Potomac Yard

2777 South Crystal Drive

Arlington, VA 22202-4501

Subject: PR Notice 98-10 Notification for Alternate Brand Name
EPA Reg. No. 75174-8
Primary Brand Name: SiS AM75

Please accept the completed application (Form 8570-1) for the notification for the alternate brand name for EPA Reg. No. 75174-8.

Primary Brand Name: SiS AM75

Alternate Brand Name: Trisilgard

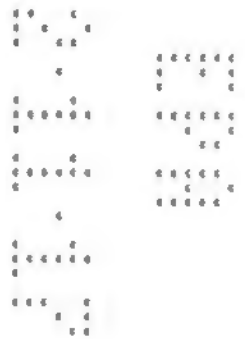
This notification is consistent with the provisions of PR Notice 1998-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand this it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the requirements of PR Notice 98-10 and 40CFR 156.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Your cooperation in processing this notification in an expedient manner is greatly appreciated. Please note that KRK Consulting LLC is the authorized agent for SiShield Technologies Inc. Please call me at 440-263-7305 if you should have any questions.

Best Regards,



Kevin R. Kutcel,
Agent for SiShield Technologies Inc.





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number SiShield Technologies / 75174-8	2. EPA Product Manager Miederhoff	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SiShield Technologies / SIS AM75	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) SiShield Technologies 17 Executive Park Drive, Suite 563 Atlanta, GA 30329 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Please see cover letter.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container
		If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1,5.55 gall	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Kevin R. Kutcel	Title Agent	Telephone No. (Include Area Code) 440-263-7305	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Agent		
4. Typed Name Kevin R. Kutcel	5. Date Dec 7, 2017		

Material Sent for Data Extraction

Reg # 75174-8

Description: _____

☒ Material(s) Sent to Data Extraction Contractor:

☐ New Stamped Label Dated _____

☐ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other: _____

☒ Decision #: 493509

☒ Other Action/Comments: _____

Superseding Letter

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: E. G. S.

Phone: 347-0199 Division: AD

Date: _____

Created February 3, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Kevin R. Kutcel
Agent for SiShield Technologies
KRK Consulting LLC
5807 Churchill Way
Medina, OH 44256

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

NOV 12 2014

SUBJECT: SIS AM 75
EPA Registration Number: 75174-8
Application Dated: June 26, 2014
Receipt Date: June 27, 2014

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended is acceptable.

- Submission of Alternate CSF

The proposed CSF for the alternate formulation or the antimicrobial, integrated, non-food and end-use product SIS AM 75 (EPA Reg. # 75174-8), dated 06/20/2014, is acceptable.

General Comments

This letter supersedes the letter dated October 02, 2014.

Should you have any questions concerning this letter, please contact Velma Noble at (703) 308-6233.

Sincerely,

A handwritten signature in black ink, appearing to read "Velma Noble", is written over the typed name.

Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

Material Sent for Data Extraction

Reg # 75174-8

Description: _____

☐ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated _____

☒ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other: _____

☐ Decision #: 423509

☒ Other Action/Comments: _____

Superseding letter

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: _____

Phone: _____ Division: AD

Date: _____

Created February 3, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Kevin R. Kutcel
Agent for SiShield Technologies
KRK Consulting LLC
5807 Churchill Way
Medina, OH 44256

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OCT 02 2014

SUBJECT: SIS AM 75
EPA Registration Number: 75174-8
Application Dated: June 26, 2014
Receipt Date: June 27, 2014

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended is acceptable.

- Submission of Alternate CSF

The proposed CSF for the alternate formulation or the antimicrobial, integrated, non-food and end-use product SIS AM 75 (EPA Reg. # 75174-8), dated 06/25/2014, is acceptable.

General Comments

This letter supersedes the letter dated September 22, 2014.

Should you have any questions concerning this letter, please contact Velma Noble at (703) 308-6233.

Sincerely,

A handwritten signature in black ink, appearing to read "Velma Noble", is written over a horizontal line.

Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

PPIS Deficiency Notice

PM NUMBER: 31

REGISTRATION NUMBER: 75174-8

Transferred from: Senedu Alemu (Macfadden)

Date Processed: 9/23/14

This jacket has been found to be deficient according to established EPA data processing guidelines for the following reasons:

1. Current accepted label dated ____/____/____
____ is missing from the jacket. ____ is missing acceptance stamp.
____ Acceptance stamp is missing date and/or registration number.
____ Is missing the following information: _____
2. Acceptance letter dated ____/____/____ and associated label are inconsistent concerning: ____ Acceptance date. ____ Product name. ____ Registration number.

Comments letter associated with label dated ____/____/____ is missing from the jacket.

Accepted (Basic / Alternate) CSF dated ____/____/____
____ Is missing from the jacket. ____ Is misfiled or has wrong registration number.
____ Sole active ingredient source product _____ - _____ has been cancelled.

____ Active and inert chemical percentages do not equal 100%.

____ Other information missing / inconsistent within the jacket. See below for details.

There is a typo on the date of the alternate CSF mentioned on epalletter dated 9/2/2014. Finally correct the error.

Thank you

REGISTRATION JACKET INTRA-TRANSFER REQUEST

(PLEASE FILL OUT FORM COMPLETELY)

Transfer File To: Velana Noble

Phone: _____

Reason For Transfer:

- ☐ RSB CHEMISTRY REVIEW
- ☐ CODING (SIG)
- ☐ ACTION COMPLETED
- ☒ PRECAUTIONARY LABEL REVIEW
- ☐ WITHDRAW PENDING APPLICATION
- ☐ OTHER _____

TRANSFERRED FROM: Senedu Alemu (SIG)

Phone: 305-6178

DATE REQUEST: 9/23/2014

PM TEAM: _____
(If Applicable)

REGISTRATION NUMBER (S) OF JACKET (S) TO BE TRANSFERRED
(PLEASE INDICATE VOLUME NUMBER IF APPLICABLE)

REGISTRATION #	COMMENTS	LOCATION	OTHER INFORMATION
<u>75794-8</u>	<u>corrected</u>	_____	_____
_____	<u>please</u>	_____	_____
_____	<u>see the</u>	_____	_____
_____	<u>superseded</u>	_____	_____
_____	<u>letter.</u>	_____	_____
_____	<u>Thanks,</u>	_____	_____
_____	<u>Emilia</u>	_____	_____

SPECIAL COMMENTS:

FOR FILE ROOM STAFF USE

NOTIFY REQUESTOR:

9/25/14
DATE

2:22
TIME

TA
INITIALS

Material Sent for Data Extraction

Reg # 75174-8

Description: _____

☒ Material(s) Sent to Data Extraction Contractor:

☐ New Stamped Label Dated _____

☐ Notification Dated _____

☒ New CSF(s) Dated 6/25/2014

☐ Other: _____

☒ Decision #: 493509

☐ Other Action/Comments: _____

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: _____

Phone: _____ Division: AD

Date: _____

Created February 3, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Kevin R. Kutcel
Agent for SiShield Technologies
KRK Consulting LLC
5807 Churchill Way
Medina, OH 44256

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

SEP 22 2014

SUBJECT: SIS AM 75
EPA Registration Number: 75174-8
Application Dated: June 26, 2014
Receipt Date: June 27, 2014

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended is acceptable.

- Submission of Alternate CSF

The proposed CSF for the alternate formulation or the antimicrobial, integrated, non-food and end-use product SIS AM 75 (EPA Reg. # 75174-8), dated 06/25/04, is acceptable.

General Comments

Should you have any questions concerning this letter, please Velma Noble at (703) 308-6233.

Sincerely,

A handwritten signature in black ink, appearing to read "Velma Noble", is written over a horizontal line.

Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

Attachment: Chemistry Review

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

Antimicrobials Division (AD)

August 11, 2014

MEMORANDUM

Subject: Product Chemistry Review for EPA Reg # 75174-8
DP#: 421779
Product Name: **SIS AM 75**

FROM: Gabriela Luta, Chemist *GLute*
Product Science Branch, CT Team
Antimicrobial Division (7510P)

THRU: Karen P. Hicks, CT Team Leader
Product Science Branch
Antimicrobial Division (7510P) *[Signature]*

TO: V. Noble/ E. Oiguenblik
PM Team

Applicant: **SiShield Technologies Inc.**

Action code: 362

Due date: 09/25/2014

Product Formulation

Active Ingredient(s):

% by wt.

3-(trihydroxysilyl) propyl dimethyl octadecyl ammonium
chloride 0.75

BACKGROUND:

KRK Consulting LLC is submitting a proposed amendment on behalf of the registrant, **Sishield Technologies Inc.**, to add a Confidential Statement of Formula (CSF) for a new alternate formulation of the product **SIS AM 75**. This antimicrobial, non-integrated, non-food and end-use product is formulated for use as a biostatatic agent for home and industrial applications.

The Product Chemistry Reviewer has reviewed the following documents:

- Confidential Statement of Formula (CSF), dated 06/20/2014, for the proposed alternate formulation.
- A letter, dated 06/26/14.
- Product label for the basic formulation, dated 01/14/2013. (Reference).
- Confidential Statement of Formula for the basic formulation, dated 05/25/2012. (Reference).

FINDINGS:

1. The CSF, dated 06/20/2014, for the alternate formulation is revised.
2. The CSF and the label have the same nominal concentrations for the active ingredient (AI).
3. All the components met the EPA 40 CFR standard certified limits.
4. The CSF for the basic formulation, dated 08/07/2014, has been updated with the corrected CAS No for the active ingredient; previous basic CSF is superceded.

CONCLUSION:

The proposed CSF for the alternate formulation for the antimicrobial, integrated, non-food and end-use product **SIS AM 75** (EPA Reg # 75174-8), dated 06/20/2014, is acceptable.

DATA PACKAGE BEAN SHEET

Date: 28-Jul-2014

Page 1 of 1

Decision #: 493509

DP #: (421779)

NON PRIA

Parent DP #:

Submission #: 954236

E-Sub #:

*** Registration Information ***

Registration: 75174-8 - SIS AM 75

Company: 75174 - SISHIELD TECHNOLOGIES, INC.

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Emilia Oiguenblik EOIGUENB

Sent Date:

PRIA Due Date: 25-Sep-2014

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (362) FORMULA CHANGE; TECHNICAL;

Ingredients: 107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride(.75%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 28-Jul-2014

Due Back:

DP Ingredient: 107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride

DP Title: Chemistry Review

CSF Included: ☒ Yes ☐ No

Label Included: ☐ Yes ☒ No

Parent DP #:

Assigned To

Date In

Date Out

Organization: AD / PSB

Last Possible Science Due Date: 25-Aug-2014

Team Name: CTT

Science Due Date:

Reviewer Name: Gabby

Sub Data Package Due Date:

Contractor Name:

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

New alternate formulation

KRK Consulting LLC

5807 Churchill Way

Medina, OH 44256

Tel: 440-263-7305

E-mail: kevinkutcel@gmail.com

June 26, 2014

US EPA (AMEND)
Office of Pesticide Programs
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Subject: PR Notice 1998-10 Fast Track Amendment for CSF Alt No. 1 (EPA No. 75174-8)

The purpose of this fast track amendment is to submit a CSF alternate formula #1 for "SiS AM75" (Reg. No. 75174-8). The only change is the addition of a stabilizer which is an inert ingredient in the formulation.

This application does comply with the requirements of a notification per PR Notice 98-10. Please accept the following documentation for this notification:

1. Application (Form 8570-1)
2. One (1) copy of basic CSF (Form 8570-4)
3. Two (2) copies of proposed CSF Alternate Formulation #1 (Form 8570-4)
4. Material Safety Data Sheet for added inert ingredient.

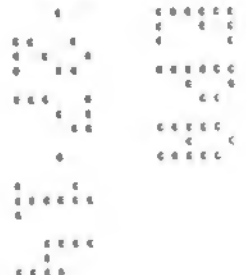
This notification is consistent with the guidance in PR Notice 1998-10 and the requirements of EPA's regulations at 40 CFR 156.46, 156.140, 156.144, 156.146 and 156.156 and no other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand this it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of PR Notice 98-10 and CFR 156.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Please note that KRK Consulting LLC is the authorized agent handling all correspondence for SiShield Technologies and therefore all responses should be directed to the contact information on the letterhead above.

Best Regards,



Kevin R. Kutcel,
Agent for SiShield Technologies





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number SiShield Technologies / 75174-8	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SiShield Technologies / SIS AM 75	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) SiShield Technologies 17 Executive Park Drive, Suite 563 Atlanta, GA 30329 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(ii), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Ma Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Please see cover letter.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1,5,55 gall		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Kevin R. Kutcel	Title Agent	Telephone No. (Include Area Code) 440-263-7305
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Kevin R. Kutcel	5. Date Jun 26, 2014	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Kevin R. Kutsel
Agent for SiShield Technologies
KRK Consulting LLC
5807 Churchill Way
Medina, OH 44256

JUL 10 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

SUBJECT: SIS AM 75
EPA Registration Number: 75174-8
Application Dated: June 16, 2014
Receipt Date: June 18, 2014

Dear Mr. Kutsel:

This letter acknowledges receipt of the notification identified above submitted under the provisions of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended and PR Notice 98-10 and 40 CFR 152.46.

- Addition of an alternate brand name "PROHIBITZ".

Based on a review of the submitted information, this notification is unacceptable for the following reason: an alternate brand name "PROHIBITZ" is false and misleading because it may give the user the impression that this product is prohibited for use.

General Comments

Should you have any questions concerning this letter, please contact Emilia Oiguenblik at (703) 347-0199 or Velma Noble at (703) 308-6233.

Sincerely,

A handwritten signature in black ink, appearing to read "V. Noble", is written over the printed name "Velma Noble".

Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

PROHIBITZ**MICROBIOSTATIC AGENT***

A Silicone Quaternary Ammonium Salt



Active Ingredient:	3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride.....	0.75%
Other Ingredients:	99.25%
TOTAL		
INGREDIENTS:	100.0%

KEEP OUT OF REACH OF CHILDREN**CAUTION**

EPA Reg. No. 75174-8

EPA EST. 69259-NC-001

NET CONTENTS: 2,4,8,16,20,22,32,36 fl oz.; 0.5, 1,5,55,75, 300 gallons.

Lot No.

FIRST AID

Have the product container or label with you with calling a poison control center or a doctor, or going for treatment.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

*A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi(mold & mildew) and algae. This product does not protect users or others against food-borne or disease causing bacteria.



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS



CAUTION: Causes moderate eye irritation. Harmful if absorbed through skin or inhaled. Do not get in eyes. Avoid contact with skin, eyes or clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Commercial and industrial uses: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

De-activation may be required during clean up if a spill occurs. De-activation of PROHIBITZ can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of PROHIBITZ.

Homeowner use: This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of pesticide.

DIRECTIONS FOR USE Approved commercial and Industrial Applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry.

PROHIBITZ can be applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying, fogging or by using foam finishing.

The substrate can be dried at temperatures from ambient to a maximum of 160° C (320° F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply PROHIBITZ every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

PROHIBITZ when used as a concrete additive is added directly during concrete preparation. Use 20 fluid ounces PROHIBITZ per cubic feet of concrete. Add to water before addition of concrete. Addition of PROHIBITZ reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

Approved commercial and industrial applications

The active ingredient in PROHIBITZ is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. PROHIBITZ can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; not to be used in treatment of storm drains
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Men's underwear and outerwear
- Non-woven disposable diapers
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened towelettes and tissue wipes (these do not impart pesticidal properties)
- Roofing materials - defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefin's, polypropylene, rayon, spandex, vinyl, wool

- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

DIRECTIONS FOR USE

**Approved commercial applications used in homes, offices, automobiles and institutions
e.g., schools, hospitals, daycare centers, churches, correctional facilities**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

For Pump Spray Application: Using pump sprayer, spray entire area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. PROHIBITZ treats approximately 200 square feet per gallon of SiS AM75. When treating coarser substrates, more PROHIBITZ may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) apply PROHIBITZ and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. PROHIBITZ treats approximately 200 square feet per gallon of SiS 75. When treating coarser substrates, more PROHIBITZ may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough PROHIBITZ solution to completely submerge item. Completely submerge item in PROHIBITZ for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), for example: in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply PROHIBITZ every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

**Approved commercial applications in homes, offices, automobiles and institutions
e.g., schools, hospitals, day care centers, banks, churches, correctional facilities**

The active ingredient in PROHIBITZ is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent.

PROHIBITZ can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Men's underwear and outerwear
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Roofing materials - defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel



DIRECTIONS FOR USE For Residential applications



It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

Approved residential uses

The active ingredient in PROHIBITZ is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. PROHIBITZ can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

	Pest controlled	Method of Application
Bedsheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hosiery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos). PROHIBITZ can be applied to fabrics made of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orlon, polyester, polyethylene, polyolefins, polypropylene, rayon, silk, spandex, vinyl, and wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	<p>DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough PROHIBITZ solution to completely submerge item. Keep item in solution for 3 minutes. Remove item and wring excess liquid. Drying may be attained by dripping dry or wringing excess liquid from treated item. For larger items (e.g., bedspreads, curtains, draperies), place in washing machine on spin cycle to aid in the removal of excess liquid. Test staining and color-fastness of fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in clothes dryer). If necessary, reapply PROHIBITZ every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.</p> <p>SPRAY: Clean surface prior to application of SIS AM75. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply PROHIBITZ every three months or when odor, staining and discoloration due to</p>

		bacteria, mold stains, and mildew stains return.
	Pest controlled	Method of Application
Air filters and air filter material for <ul style="list-style-type: none"> • Furnaces, air conditioners • Air purification systems • Automobiles • Recirculating air handling systems • Vacuum cleaner filters • Aquariums 	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	SPRAY: When treating filters, remove filter from the unit. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry. If necessary, reapply PROHIBITZ every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Method of Application
Carpeting	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Apply PROHIBITZ to clean carpet surface. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. For rotary jet extraction cleaners and carpet steamers, add the diluted PROHIBITZ solution directly to the cleaning tank, then operate the equipment in accordance with manufacturer's instructions. Apply and then let stand until dry. Test staining and color-fastness of carpets by treating and drying a small concealed area prior to application. PROHIBITZ treats approximately 200 square feet. When treating coarser substrates (e.g., wool carpeting), more PROHIBITZ may be required due to absorption. Dry carpet areas and surfaces before re-entry. A fan may be used to assist in drying carpeting. Remove children and pets from treated area until completely dried. If necessary, reapply PROHIBITZ every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
	Pest controlled	Method of Application
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold	SPRAY: Clean surfaces prior to application of PROHIBITZ. Using a trigger pump sprayer spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area

wool	and mildew)	until completely dried. If necessary, reapply PROHIBITZ every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	Method of Application
Tents, tarpaulins, sails, ropes.	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	<p>SPRAY: Clean surface prior to application of PROHIBITZ. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply PROHIBITZ every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.</p> <p>DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough PROHIBITZ solution to completely submerge item. Keep item in solution for three minutes. Remove item and wring excess liquid. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply PROHIBITZ every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.</p>
	Pest controlled	Method of Application
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats)	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	<p>SPRAY: Make sure the roof is clean prior to application of PROHIBITZ. Using a pressure sprayer, spray the entire surface area 6"-12" from the surface making sure the surface is completely covered. After applying the dilute solution of PROHIBITZ, let stand until dry. PROHIBITZ treats approximately 200 square feet of roofing per diluted gallon of water. If necessary, reapply PROHIBITZ every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.</p>

	Pest controlled	Method of Application
Buffer pads (polishing and abrasive), Polyurethane for household sponges and mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Clean surface prior to application of PROHIBITZ. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply PROHIBITZ every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
	Pest controlled	Method of Application
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks, washable walls, wall paper for non-food contact, floors, window sills, cabinets, garbage cans, appliances, refrigerators (exterior), fiberglass, Formica, glazed tiles, glazed porcelain, synthetic marble, plastic, vinyl	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply PROHIBITZ every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.



MOLD, MILDEW, ODOR PROTECTOR AND INHIBITOR PROHIBITZ is an antimicrobial agent effective against odor causing bacteria.

PROHIBITZ is an antimicrobial agent effective against bacteria which cause staining and discoloration.

PROHIBITZ is an antimicrobial agent effective against fungi (mold and mildew).

PROHIBITZ is an antimicrobial agent effective against algae.

PROHIBITZ, an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen.

Bacteriostatic, fungistatic (mold and mildew), algaestatic.

PROHIBITZ, an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

PROHIBITZ, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew).

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew).

Use on carpet and upholstery to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew).

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew).

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew).

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Residential Use Only

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Securely wrap original container in several layers of newspaper and discard in trash.

Commercial and Industrial Containers

Container Handling: REFILLABLE CONTAINER. Refill this container with this product only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

Container Disposal:

For Containers Less than 5 gallons.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

For Containers Greater than 5 gallons.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill container ¼ full with water. Replace and tighten closure. Tip container in its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Repeat this procedure two more times. Then offer for recycling or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING SISHIELD TECHNOLOGIES, INC. at 17 Executive Park Drive, Suite 563, GA 30329.

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

SiShield Technologies, Inc., warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

SISHIELD SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY.

KRK Consulting LLC

5807 Churchill Way

Medina, OH 44256

Tel: 440-263-7305

E-mail: kevinkutcel@gmail.com

June 16, 2014

US EPA (NOTIF)
Office of Pesticide Programs
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

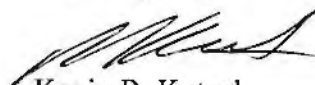
Subject: PR Notice 1998-10 Notification for ABN (EPA No. 75174-8)

Please accept the attached 3 copies of the revised label for Reg. No. 75174-8 with the alternate brand name "PROHIBITZ" per PR Notice 1998-10.

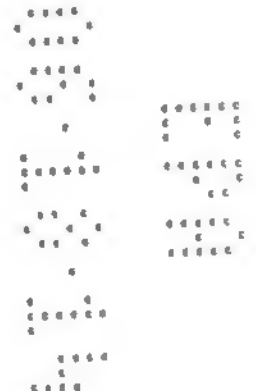
Attached is EPA Form 8570-1 regarding this notification as required in PR Notice 1998-10. This notification is consistent with the guidance in PR Notice 1998-10 and the requirements of EPA's regulations at 40 CFR 156.46, 156.140, 156.144, 156.146 and 156.156 and no other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand this it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of PR Notice 98-10 and CFR 156.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Please note that KRK Consulting LLC is the authorized agent handling all correspondence for SiShield Technologies and therefore all responses should be directed to the contact information on the letterhead above.

Best Regards,



Kevin R. Kutcel,
Agent for SiShield Technologies





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number SiShield Technologies / 75374-8	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SiShield Technologies / SIS AM 75	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) SiShield Technologies 17 Executive Park Drive, Suite 563 Atlanta, GA 30329 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Please see cover letter.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1.5, 55 gall		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Kevin R. Kutcel	Title Agent	Telephone Nos (Include Area Code) 440-263-7305
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Kevin R. Kutcel	5. Date Jun 16, 2014	

Material Sent for Data Extraction

Reg # 75174-I

Description: _____

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated _____

☐ Notification Dated _____

☒ New CSF(s) Dated _____

☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: D. Cope land

Phone: _____ Division: AD

Date: 1/14/13

Created February 13, 2011



U.S. ENVIRONMENTAL PROTECTION
AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510P)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

EPA Reg.
Number:
75174-8

Date of Issuance:
JAN 14 2012

Term of Issuance:
Conditional

Name of Pesticide Product:

SIS AM 75

Name and Address of Registrant (include ZIP Code):

SIShield Technologies
17 Executive Park Drive, Suite 563
Atlanta, GA 30329

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product (OPP Decision No. D-407846) is conditionally registered in accordance with FIFRA sec 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA section 4.

2. Make the labeling changes listed below before you release the product for shipment:

a. Revise the "EPA Registration Symbol to read, "EPA Reg. No." 75174-8

Signature of Approving Official:

Velma Noble
Product Manager Team-31
Regulatory Management Branch
Antimicrobials Division (7510P)

Date:

JAN 14 2012

3. See Product Chemistry Review dated 12/21/2012 for all comments.

4. Note that we are accepting the citation for the analytical method on your data matrix. However, the additional information needed to upgrade the analytical method submitted by SISHield must be submitted as soon as possible. This data will be needed for product reregistration.

5. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. Should you have any questions regarding this letter, please contact.

Sincerely,



Velma Noble
Product Manager (31)
Regulatory Management Branch
Antimicrobials Division (7510P)

Enclosure: stamped label, product chemistry review dated 12/21/12

SIS AM 75

MICROBIOSTATIC AGENT* A Silicone Quaternary Ammonium Salt

ACCEPTED
with COMMENTS
in EPA Letter Dated:
JAN 14 2013
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 75194-8

Active Ingredient:	3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride.....	0.75%
Other Ingredients:	99.25%
TOTAL		
INGREDIENTS:	100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

EPA Reg. No. 75174-

EPA EST. 69259-NC-001

NET CONTENTS: 2,4,8,16,20,22,32,36 fl oz.; 0.5, 1,5,55,75, 300 gallons.

Lot No.

FIRST AID
Have the product container or label with you with calling a poison control center or a doctor, or going for treatment.
IF IN EYES: <ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. • Call poison control center or doctor for treatment advice.
IF INHALED: <ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
IF ON SKIN: <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED: <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.

*A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi(mold & mildew) and algae. This product does not protect users or others against food-borne or disease causing bacteria.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JAN 14 2013
Under Federal Insecticide,
Fungicide, and Rodenticide Act as
Anticorrosive for concrete,
registered under EPA Reg. No. 75174-8

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Harmful if absorbed through skin or inhaled. Do not get in eyes. Avoid contact with skin, eyes or clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Commercial and industrial uses: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

De-activation may be required during clean up if a spill occurs. De-activation of SIS AM 75 can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of SIS AM 75.

Homeowner use: This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of pesticide.

DIRECTIONS FOR USE Approved commercial and Industrial Applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry.

SIS AM 75 can be applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying, fogging or by using foam finishing.

The substrate can be dried at temperatures from ambient to a maximum of 160° C (320° F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply SIS AM 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

SIS AM 75 when used as a concrete additive is added directly during concrete preparation. Use 20 fluid ounces SIS AM 75 per cubic feet of concrete. Add to water before addition of concrete. Addition of SIS AM 75 reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

Approved commercial and industrial applications

The active ingredient in SIS AM 75 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. SIS AM 75 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; not to be used in treatment of storm drains
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Men's underwear and outerwear
- Non-woven disposable diapers
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened towelettes and tissue wipes (these do not impart pesticidal properties)
- Roofing materials - defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefin's, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters

ACCEPTED
with COMMENTS
in EPA Letter Dated:
JAN 14 2013

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for use as a bactericide,
registered under EPA Reg. No. 75748

PAGE 4 - MASTER LABEL FOR SIS AM 75

- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

DIRECTIONS FOR USE

**Approved commercial applications used in homes, offices, automobiles and institutions
e.g., schools, hospitals, daycare centers, churches, correctional facilities**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

For Pump Spray Application: Using pump sprayer, spray entire area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. SIS AM 75 treats approximately 200 square feet per gallon of SiS AM75. When treating coarser substrates, more SIS AM 75 may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) apply SIS AM 75 and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. SIS AM 75 treats approximately 200 square feet per gallon of SiS 75. When treating coarser substrates, more SIS AM 75 may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough SIS AM 75 solution to completely submerge item. Completely submerge item in SIS AM 75 for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), for example: in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply SIS AM 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JAN 14 2013

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under Reg. No. 75174-8

**Approved commercial applications in homes, offices, automobiles and institutions
e.g., schools, hospitals, day care centers, banks, churches, correctional facilities**

The active ingredient in SIS AM 75 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent.

SIS AM 75 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Men's underwear and outerwear
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Roofing materials - defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JAN 14 2013

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 75174-8

DIRECTIONS FOR USE For Residential applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

Approved residential uses

The active ingredient in SIS AM 75 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. SIS AM 75 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

	Pest controlled	Method of Application
Bedsheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hosiery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos). SIS AM 75 can be applied to fabrics made of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orlon, polyester, polyethylene, polyolefins, polypropylene, rayon, silk, spandex, vinyl, and wool ACCEPTED with COMMENTS in EPA Letter Dated: JAN 14 2013 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 751748	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	<p>DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough SIS AM 75 solution to completely submerge item. Keep item in solution for 3 minutes. Remove item and wring excess liquid. Drying may be attained by dripping dry or wringing excess liquid from treated item. For larger items (e.g., bedspreads, curtains, draperies), place in washing machine on spin cycle to aid in the removal of excess liquid. Test staining and color-fastness of fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in clothes dryer). If necessary, reapply SIS AM 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.</p> <p>SPRAY: Clean surface prior to application of SIS AM75. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply SIS AM 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.</p>

PAGE 7 - MASTER LABEL FOR SIS AM 75

	Pest controlled	Method of Application
Air filters and air filter material for <ul style="list-style-type: none"> • Furnaces, air conditioners • Air purification systems • Automobiles • Recirculating air handling systems • Vacuum cleaner filters • Aquariums 	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	SPRAY: When treating filters, remove filter from the unit. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry. If necessary, reapply SIS AM 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Method of Application
Carpeting <div> ACCEPTED with COMMENTS in EPA Letter Dated: JAN 14 2011 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 751748 </div>	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Apply SIS AM 75 to clean carpet surface. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. For rotary jet extraction cleaners and carpet steamers, add the diluted SIS AM 75 solution directly to the cleaning tank, then operate the equipment in accordance with manufacturer's instructions. Apply and then let stand until dry. Test staining and color-fastness of carpets by treating and drying a small concealed area prior to application. SIS AM 75 treats approximately 200 square feet. When treating coarser substrates (e.g., wool carpeting), more SIS AM 75 may be required due to absorption. Dry carpet areas and surfaces before re-entry. A fan may be used to assist in drying carpeting. Remove children and pets from treated area until completely dried. If necessary, reapply SIS AM 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
	Pest controlled	Method of Application
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Clean surfaces prior to application of SIS AM 75. Using a trigger pump sprayer spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area until completely dried. If necessary, reapply SIS AM 75 every three months or when odor, staining and discoloration due to bacteria, mold

		stains and mildew stains return.
	Pest controlled	Method of Application
<p>Tents, tarpaulins, sails, ropes.</p> <p>ACCEPTED with COMMENTS in EPA Letter Dated: JAN 14 2011</p> <p>Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 75174-B</p>	<p>Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae</p>	<p>SPRAY: Clean surface prior to application of SIS AM 75. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply SIS AM 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.</p> <p>DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough SIS AM 75 solution to completely submerge item. Keep item in solution for three minutes. Remove item and wring excess liquid. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply SIS AM 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.</p>
	Pest controlled	Method of Application
<p>Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats)</p>	<p>Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae</p>	<p>SPRAY: Make sure the roof is clean prior to application of SIS AM 75. Using a pressure sprayer, spray the entire surface area 6"-12" from the surface making sure the surface is completely covered. After applying the dilute solution of SIS AM 75, let stand until dry. SIS AM 75 treats approximately 200 square feet of roofing per diluted gallon of water. If necessary, reapply SIS AM 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.</p>
	Pest controlled	Method of Application
<p>Buffer pads (polishing and abrasive), Polyurethane for household sponges and</p>	<p>Odor causing bacteria,</p>	<p>SPRAY: Clean surface prior to application of SIS AM 75. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area</p>

PAGE 9 - MASTER LABEL FOR SIS AM 75

mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	bacteria which cause staining and discoloration, and fungi (mold and mildew)	4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply SIS AM 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
	Pest controlled	Method of Application
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks, washable walls, wall paper for non-food contact, floors, window sills, cabinets, garbage cans, appliances, refrigerators (exterior), fiberglass, Formica, glazed tiles, glazed porcelain, synthetic marble, plastic, vinyl	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply SIS AM 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

ACCEPTED
with COMMENTS
in EPA Letter Dated:
JAN 14 2013

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 75174-B

MOLD, MILDEW, ODOR PROTECTOR AND INHIBITOR SIS AM 75 is an antimicrobial agent effective against odor causing bacteria.

SIS AM 75 is an antimicrobial agent effective against bacteria which cause staining and discoloration.

SIS AM 75 is an antimicrobial agent effective against fungi (mold and mildew).

SIS AM 75 is an antimicrobial agent effective against algae.

SIS AM 75, an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen.

Bacteriostatic, fungistatic (mold and mildew), algaestatic.

SIS AM 75, an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

SIS AM 75, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew).

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew).

Use on carpet and upholstery to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew).

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew).

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew).

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

RECEIVED
with COMMENTS
in EPA Letter Dated:
JAN 74 2013
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 75174-8

EPA

STORAGE AND DISPOSAL

05-04-12

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Residential Use Only

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Securely wrap original container in several layers of newspaper and discard in trash.

Commercial and Industrial Containers

Container Handling: REFILLABLE CONTAINER. Refill this container with this product only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

Container Disposal:

For Containers Less than 5 gallons.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

For Containers Greater than 5 gallons.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill container ¼ full with water. Replace and tighten closure. Tip container in its side and roll it back and forth, ensuring at least one complete revolutions, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Repeat this procedure two more times. Then offer for recycling or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

ACCEPTED
with COMMENTS
in EPA Letter Dated

JAN 14 2013

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 75174-8

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING SISHIELD TECHNOLOGIES, INC. at 17 Executive Park Drive, Suite 563, GA 30329.

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

SiShield Technologies, Inc., warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

SISHIELD SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY.

ACCEPTED
with COMMENTS
in EPA Letter Dated:
[JAN 14 2013]

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 75174-8

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**



United States
Environmental Protection
Agency

Office of Pesticide Programs

Antimicrobials Division (AD)

December 21, 2012

EPA Reg#: 75174-I		DP Barcode: D407846 Submission #: 928537	
Product name: SIS AM 75		Registrant: Sishield Technologies, Inc..	
Reviewer's name: Chris Jiang		AD/PSB/CTT- Product Chemistry Review	
Agency due date: January 15, 2013		PSB received date: October 25, 2012	
CTT received date: October 26, 2012		Science due date: December 16, 2012	
Formulation type: TGAI ; MUP ; EUP X			
Integrated system: <input type="checkbox"/>	Non integrated system: <input checked="" type="checkbox"/>	Food use: <input type="checkbox"/>	Non food use: <input checked="" type="checkbox"/>
Action Code: A530		Date Completed: December 20, 2012	
PC Code(s))	CAS #(s)	Active Ingredient Names	% wt (label)
107403	199111-50-7	3-(Trihydroxysilyl) propyloctadecyl ammonium chloride	0.75
Molecule structure (optional):			
Test Lab:			
MRID(s): 48950201			
Approver: Karen P. Hicks		Approved date: December 21, 2012	
Guideline: 830 Guidelines			
Comments:			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION
PREVENTION

December 21, 2012

MEMORANDUM

Subject: Review for 75174-I

From: Chris Jiang, Chemist
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

Thru: Karen P. Hicks, CT Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

To: Velma Noble/Drusilla Copeland
Regulatory Management Branch I
Antimicrobials Division (7510P)

Applicant: Sishield Technologies, Inc.

Chris Jiang
12/21/12
for KPH 12/21/12

Formulation from Label

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
3-(Trihydroxysilyl) propyloctadecyl ammonium chloride	0.75
<u>Other Ingredients</u>	99.25
Total	100.0

BACKGROUND:

The registrant has submitted a product chemistry package in support of the registration for an end-use product. The package includes a label, a Confidential Statement of Formula (CSF) for the basic formulation, a data matrix, and MRID 48950201 to address the product chemistry requirement for this microbiostatic agent for non-food industrial use.

FINDINGS:

1. The concentration of the active ingredient on the Confidential Statement of Formula (CSF dated 5/25/12 for the basic formulation) is consistent with the label declaration.
2. All ingredients are approved for non-food use in pesticidal products.
3. The product identity and composition is **acceptable**.
4. The description of the starting materials is **acceptable**.
5. The description of the production process is **not required** as the product is produced from a non-integrated system.
6. The description of the formulation process is **acceptable** as the product is produced from a non-integrated system.
7. The discussion of the formation of impurities is **not required** now that the product is produced from a non-integrated system.
8. The preliminary analysis is **not required** as the product is produced from a non-integrated system.
9. The certified limits are based on EPA standard certified limits and are **acceptable**.
10. The enforcement analytical method is **unacceptable**. The method must be a thorough narrative that includes details including but not limited to the sample preparation, standard preparation, standardization procedures, the concentrations where the method is suitable, and an equation with all variables and unknown numbers defined.
11. The registrant has revised the data matrix to include the physical/chemical properties.

CONCLUSIONS:

Product Science Branch of Antimicrobials Division finds CSF dated May 25, 2012 for the basic formulation for 75174-I to be acceptable and the data for 75174-I to be unacceptable for the reasons indicated in the findings. The registrant must correct the issues discussed in the findings for successful registration to proceed.

DATA PACKAGE BEAN SHEET

Date: 24-Oct-2012

Page 1 of 2

Decision #: 465646

DP #: (406245)

PRIA

Parent DP #:

Submission #: 924286

E-Sub #:

*** Registration Information ***

Registration: 75174-I - SIS AM 75

Company: 75174 - SISHIELD TECHNOLOGIES, INC.

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Drusilla Copeland DCOPELAN

Sent Date: 25-Sep-2012

PRIA Due Date: 15-Jan-2013

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (A530) ME-TOO;NEW PRODUCT;FAST TRACK;

Ingredients: 107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride(.75%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 24-Oct-2012

Due Back: _____

DP Ingredient: 107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride

DP Title: Product Chemistry

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

Last Possible Science Due Date: 16-Dec-2012

Team Name: CTT

Science Due Date: _____

Reviewer Name: Chris

10/24/12

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Resubmission:

Please review the Group A product chemistry data in MRID 48950201

MRID	MRID Status	Citation Reference	Guideline	86-5 Status
48950201		Kutcel, K. (2012) Product Chemistry: SiS AM75. Project Number: SIS/AM75. Unpublished study prepared by SiShield Technologies, Inc. 12p.	830.1550/Product Identity and composition	
48950201		Kutcel, K. (2012) Product Chemistry: SiS AM75. Project Number: SIS/AM75. Unpublished study prepared by SiShield Technologies, Inc. 12p.	830.1600/Description of materials used to produce the product	
48950201		Kutcel, K. (2012) Product Chemistry: SiS AM75. Project Number: SIS/AM75. Unpublished study prepared by SiShield Technologies, Inc. 12p.	830.1650/Description of formulation process	
48950201		Kutcel, K. (2012) Product Chemistry: SiS AM75. Project Number: SIS/AM75. Unpublished study prepared by SiShield Technologies, Inc. 12p.	830.1750/Certified limits	
48950201		Kutcel, K. (2012) Product Chemistry: SiS AM75. Project Number: SIS/AM75. Unpublished study prepared by SiShield Technologies, Inc. 12p.	830.1800/Enforcement analytical method	

NOTE TO Sacket



75174-I

Dennis Edwards to: Drusilla Copeland, Velma Noble

01/16/2013 08:24 AM

From: Dennis Edwards/DC/USEPA/US

To: Drusilla Copeland/DC/USEPA/US@EPA, Velma Noble/DC/USEPA/US@EPA

Dru,

There have been a number of discussions with Keven Kutzel regarding the need for an analytical method for the subject product. Mr. Kutzel has submitted an analytical method which Chris Jiang has reviewed and identified additional information that is needed in order to accept the method. Mr. Kutzel has also cited an analytical method accepted for an identical product. Since the analytical method cited was on an identical product and the method was accepted when that product was registered, we will allow Mr. Kutzel to use that cited method at this time. The registration notice will place Mr. Kutzel on notice that the additional information cited by Mr. Jiang in his review is still needed to upgrade the analytical method requirement for this product especially since it is likely that the cited method may have some deficiencies if rereviewed today.

Dennis Edwards, Chief
Regulatory Management Branch 1
Antimicrobials Division
703-308-8087



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number SiShield Technologies / 75174-I	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SiShield Technologies / SIS AM 75	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) SiShield Technologies 17 Executive Park Drive, Suite 563 Atlanta, GA 30329 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 70871-19 Product Name BST Protectant RTU 75	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>9/19/12</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Please accept the product chemistry, subgroup A package in response to US EPA letter dated 9/19/2012.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Kevin R. Kutcel	Title Agent	Telephone No. (Include Area Code) 440-263-7305
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature	3. Title Agent	
4. Typed Name Kevin R. Kutcel	5. Date 9/23/2012	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OPP Decision Number D 465646

Kevin Kutcel
Agent for SisShield
5807 Churchill Way
Medina, Ohio 44256

DEC 11

Subject: Application for Registration
Product Name: SIS AM 75
EPA File Symbol: 75174-1
Application Date: August 23, 2012
EPA Receipt Date: August 15, 2012

Dear Mr. Kutcel :

Our records indicate that the decision review period for EPA to make a determination regarding the above referenced application ends on January 15, 2013 as pursuant to the Pesticide Registration Improvement Act (PRIA). The application has been determined, pursuant to 40 CFR 152.105, not to be sufficiently complete to process; therefore, the application is considered deficient. Your options under 40 CFR 152.105 and section 33 of FIFRA are addressed separately because each involves a different timeframe and set of options for responding to this letter. Please ensure that you consider each of the sections below in determining how and when you respond to this letter.

40 CFR 152.105:

Pursuant to 40 CFR 152.105, you are allowed 75 days from the date of this letter to provide a response concerning the deficiencies listed in this letter. Your response may include making corrections to complete the application, or notifying the Agency of the date on which you expect to complete the application, or withdrawing your application. If you do not respond to this letter within 75 days or if you respond with a date on which you expect to complete the application but fail to meet that scheduled date, the Agency will treat the application as if you had withdrawn it.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							74

OFFICIAL FILE COPY

Address the following deficiencies:

Chemistry Data:

Product Science Branch of Antimicrobials Division finds CSF dated May 25, 2012 for the basic formulation and the data for 75174-1 to be unacceptable for the reasons indicated in the findings. The registrant must correct the issues discussed in the findings for successful registration to proceed

Please see the attached review, D 465646 for additional details.

FIFRA Section 33/PRIA:

This application is also subject to a deadline for making a determination on the application under FIFRA Section 33, Pesticide Registration Service Fees, established under PRIA. The time frame for the Agency to make a determination on this application ends on January 15, 2013. Because the deadline for the agency to make a determination on this application expires before the end of the 75 days you have to respond to the deficiencies noted above, you have the following three options:

- 1. Establish a new due date.** You may resolve the issues identified in this letter by submitting a reply to the Agency by January 03, 2013 with information as how you plan to address this deficiency. Please include your proposed re-negotiated PRIA due date and the date you expect to submit the fix at this time. Your re-negotiated PRIA due date must include the date that you expect to submit the fix plus an additional 120 days beyond the current due date of January 15, 2013 for Agency review. If no other issues arise as a result of your response to this letter or during our review process, and the information is found to be acceptable, it is the Agency's expectation that resolution of the deficiencies will result in the granting of your application.
- 2. Withdraw the application.** Alternatively, you may notify us not later than of January 03, 2013 that you are withdrawing your application. As noted above, withdrawal concludes the Agency's review of your application; however, you may resubmit your application after the deficiencies have been addressed. Should you choose to resubmit your application, it would be subject to a new deadline for making a determination on your application and a new registration service fee.
- 3. Not respond.** If the Agency does not hear from you January 03, 2013 the Agency in meeting its obligations under section 33/PRIA may issue a determination to not grant your application. While a determination to not grant an application would allow EPA to have met its obligation under section 33 of FIFRA to issue a determination by a specified date, this determination is neither a denial of the application pursuant to section 3(c)(6) of FIFRA or a withdrawal of the application. Thus, the Agency will continue to diligently

work on any such application as long as EPA receives a response to a deficiency notice within the 75 days described above.

Please respond to this letter by **January 03, 2013** by contacting Velma Noble by telephone at (703) 308-6233 or by e-mail at Noble.velma@epa.gov with a response and for any questions concerning this letter. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Velma Noble', with a stylized flourish at the end.

Velma Noble
Product Manager 31
Regulatory Management Branch I
Antimicrobials Division (7510P)

Enclosure: Chemistry review

KRK Consulting LLC

5807 Churchill Way

Medina, OH 44256

Tel: 440-263-7305

E-mail: kevinkutcel@gmail.com

September 23, 2012

Ms. Drusilla Copeland
Product Manager 31
Antimicrobials Division (7510P)
US Environmental Protection Agency
Office of Pesticide Programs
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Subject: File Symbol 75174-I

Dear Ms. Noble,

Please find attached three copies of product chemistry, subgroup A per your letter dated September 19, 2012 regarding Reg. No. 75174-I. Also attached is the application (Form 8570-1) and data matrix (Form 8570-35) regarding this submission. Even though SiShield Technologies agreed to renegotiate a revised due date of 120 days beyond the current due date of September 25, 2012, SiShield Technologies would appreciate a prompt review of this product chemistry, subgroup A and subsequent registration as they were only informed about this requirement on September 19, 2012, yet still promptly replied before the initial PRIA due date of September 25, 2012.

Your cooperation is greatly appreciated. If you have any questions concerning this response to your letter, please call me at 440-263-7305..

Best Regards,



Kevin R. Kutcel,
Agent for SiShield Technologies

48950201 Volume 1: Product Chemistry

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. Kevin R. Kutcel
Agent for
SiShield Technologies
17 Executive Park Drive, Suite 563
Atlanta, GA 30329

SEP 19 2012

Subject: **SIS AM 75**
File Symbol 75174-I
Application Date: May 25, 2012
EPA Receipt Date: June 4, 2012

Dear Mr. Kutcel:

Our records indicate that the decision review period for EPA to make a determination regarding the above referenced application ends on **September 25, 2012** pursuant to the Pesticide Registration Improvement Act (PRIA). The application has been determined, pursuant to 40 CFR 152.105, not to be sufficiently complete to process; therefore, the application is considered deficient. Your options under 40 CFR 152.105 and section 33 of FIFRA are addressed separately because each involves a different timeframe and set of options for responding to this letter. Please ensure that you consider each of the sections below in determining how and when you respond to this letter.

40 CFR 152.105:

Pursuant to 40 CFR 152.105, you are allowed 75 days from the date of this letter to provide a response concerning the deficiencies listed in this letter. Your response may include making corrections to complete the application, or notifying the Agency of the date on which you expect to complete the application, or withdrawing your application. If you do not respond to this letter within 75 days or if you respond with a date on which you expect to complete the application but fail to meet that scheduled date, the Agency will treat the application as if you had withdrawn it.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

Address the following deficiencies:

The proposed product submitted for registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) is not acceptable.

Product Chemistry

Group A product chemistry data must be submitted. Although you have chosen the cite all method of data compensation and identified a substantially similar product, product chemistry data is required because there are difference between the cited product and the one proposed for registration.

FIFRA Section 33/PRIA:

This application is also subject to a deadline for making a determination on the application under FIFRA Section 33, Pesticide Registration Service Fees, established under PRIA. The time frame for the Agency to make a determination on this application ends on September 25, 2012. Because the deadline for the agency to make a determination on this application expires before the end of the 75 days you have to respond to the deficiencies noted above, you have the following three options:

1. Establish a new due date. You may resolve the issues identified in this letter by submitting a reply to the Agency by September 19, 2012 with information as how you plan to address these deficiencies. Please include your proposed re-negotiated PRIA due date and the date you expect to submit the fix at this time. Your re-negotiated PRIA due date must include the date that you expect to submit the fix plus an additional 120 days for Agency review.

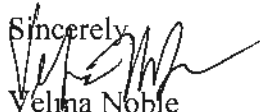
- a) Should your fix arrive prior to the current due date of September 25, 2012, propose a renegotiated date of 120 days beyond the current due date for review.
- b) Should your fix arrive after the current due date, propose a renegotiated due date of 120 days beyond your fix date for Agency review.
- c) Should you provide your fix prior to September 25, 2012, propose a renegotiated due date of 120 days beyond the current due date. If no other issues arise as a result of your response to this letter or during our review process, and the information is found to be acceptable, it is the Agency's expectation that resolution of the deficiencies will result in the granting of your application.

2. Withdraw the application. Alternatively, you may notify us not later than **September 25, 2012** that you are withdrawing your application. As noted above, withdrawal concludes the Agency's review of your application; however, you may resubmit your application after the deficiencies have been

2. Withdraw the application. Alternatively, you may notify us not later than **September 25, 2012** that you are withdrawing your application. As noted above, withdrawal concludes the Agency's review of your application; however, you may resubmit your application after the deficiencies have been addressed. Should you choose to resubmit your application, it would be subject to a new deadline for making a determination on your application and a new registration service fee.

3. Not respond. If the Agency does not hear from you by **September 25, 2012** the Agency in meeting its obligations under section 33/PRIA may issue a determination to not grant your application. While a determination to not grant an application would allow EPA to have met its obligation under section 33 of FIFRA to issue a determination by a specified date, this determination is neither a denial of the application pursuant to section 3(c)(6) of FIFRA or a withdrawal of the application. Thus, the Agency will continue to diligently work on any such application as long as EPA receives a response to a deficiency notice within the 75 days described above.

Please respond to this letter by **September 20, 2012** by contacting Drusilla Copeland by telephone, (703) 308-6224, or by e-mail at copeland.drusilla@epa.gov or Velma Noble by telephone at (703) 308-6233 or by e-mail at Noble.velma@epa.gov with a response and for any questions concerning this letter. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,


Velma Noble
Product Manager 31
Regulatory Management Branch I
Antimicrobials Division (7510P)

7510P: D. Copeland: 9/19/12:75174-I b less than 75 day letter

KRK Consulting LLC

5807 Churchill Way

Medina, OH 44256

Tel: 440-263-7305

E-mail: kevinkutcel@gmail.com

US EPA (REGFEE)
Office of Pesticide Programs
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

May 25, 2012

Subject: New Registration for SIS AM 75 (EPA No. 75174-)

Please accept the completed application for a new registration for the product, "SIS AM 75" (Reg. No. 75174-). This is a "Me-Too" registration to Reg No. 70871-19 since the active ingredient and label claims are identical to the cited label. This application is a "cite-all" in which all the original data submitters for the active ingredient are listed on the enclosed data matrices and have been sent a certified letter offering compensation for their data. Product chemistry has not been submitted with this application because the product is identical to the cited "Me-Too." Therefore, the proposed action code for this new registration is "A530".

Within this packet, the following information is included:

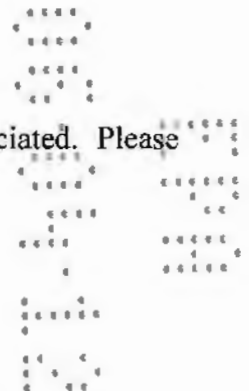
1. Receipt for payment (tracking number 74316185591) for a total of \$290.00. This payment reflects a 75% waiver of payment. SiShield Technologies was already approved for this waiver on March 8, 2011 (OPP Decision Number D-444778). It is understood that this approval was only for the year 2011, but included in this packet is a letter from SiShield Technologies verifying that the information has not changed. SiShield Technologies has requested that they be contacted directly if additional information is required as it pertains to the small business waiver.
2. Letter of authorization allowing KRK Consulting LLC to represent SiShield Technologies Inc. in all matters related to the U.S. EPA.
3. Application for the Registration for "SIS AM 75" that includes:
 - a. Five (5) copies of proposed EPA Label with CD that contains pdf of proposed label.
 - b. Form 8570-1 Application Form
 - c. Form 8570-34 Certification with Respect to Citation of Data
 - d. Form 8570-4 Confidential Statement of Formula
 - f. Form 8570-35 Data Matrix (2 pages)

Your cooperation in processing this application in an expedient manner is greatly appreciated. Please call me at 440-263-7305 if you should have any questions.

Best Regards,



Kevin R. Kutcel,
Agent for SiShield Technologies Inc.





United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number SiShield Technologies / 75174-	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SiShield Technologies / SIS AM 75	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) SiShield Technologies 17 Executive Park Drive, Suite 563 Atlanta, GA 30329 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. 70871-19 Product Name BST Protectant RTU 75	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Please accept this application for a "Me-Too" registration for SIS AM75 that is identical to Reg. No. 70871-19.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Kevin R. Kutcel	Title Consultant	Telephone No. (Include Area Code) 440-263-7305
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped),
2. Signature 	3. Title Agent	
4. Typed Name Kevin R. Kutcel	5. Date May 25, 2012	



DATA MATRIX

Page 1 of 1

SIS AM 75

Note

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09/23/2012



SiShield Technologies, Inc.

November 12, 2010

U.S. Environmental Protection Agency
Office of Pesticide Programs (COADR)
Document Processing Desk (7504P)
One Potomac Yard – Room S4900
2777 S. Crystal Drive
Arlington, VA 22202

RE: Authorization for Representation / Agent Status

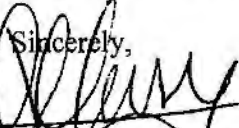
Pursuant to 40 CFR 152.50(b)(3), we hereby designate Kevin Kutcel of KRK Consulting LLC as an Authorized Agent to act in behalf of SiShield Technologies Inc. with respect to all registration matters that may come before the Agency. The address of record for all matters related to FIFRA will be:

SiShield Technologies Inc.
c/o Kevin Kutcel
KRK Consulting LLC
5807 Churchill Way
Medina, OH 44256

Contact: Kevin Kutcel - Tel. 440-263-7305

This authorization will remain valid until further notice is given by either SiShield Technologies, Inc. or KRK Consulting LLC.

If you have any questions, please contact KRK Consulting LLC at 440-263-7305.

Sincerely,


Mr. Jacques Effersy
SiShield Technologies, Inc.

Cc: Kevin Kutcel – KRK Consulting LLC

17 Executive Park Drive, Suite 563, Atlanta GA 30329, 404.636.8900 / 404.636.85001 fax



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number SiShield Technologies, 17 Executive Park Drive, Suite 563, Atlanta, GA 30329	EPA Registration Number/File Symbol 75174-
Active Ingredient(s) and/or representative test compound(s) 3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride	Date 5/25/2012
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) antimicrobial	Product Name SIS AM 75

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input checked="" type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 5/25/2012	Typed or Printed Name and Title Kevin R. Kutcel - Consultant
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From: paygovadmin@mail.doc.twai.gov
To: kevinkutcel@gmail.com
Subject: Pay.gov Payment Confirmation: PRIA Service Fees
Date: Wednesday, May 23, 2012 10:59:40 AM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Pay.gov Customer Service by phone at (800) 624-1373 or by email at pay.gov.clev@clev.frb.org.

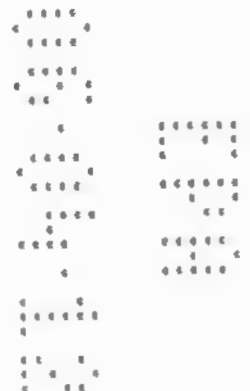
Application Name: PRIA Service Fees
Pay.gov Tracking ID: 256PDVVM
Agency Tracking ID: 74316185591

Account Holder Name: sisshield technologies, inc.
Transaction Type: ACH Debit
Transaction Amount: \$290.00
Payment Date: May 24, 2012
Account Type: Business Checking
Routing Number: 061000052
Account Number: *****9164

Transaction Date: May 23, 2012 10:59:36 AM
Total Payments Scheduled: 1
Frequency: OneTime

Decision Number:
Registration Number:
Company Name: sisshield technologies, in
Company Number: 75174
Action Code: A530

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 6-4-12

Experts In-Processing Signature: MF Harrington Date 6-7-12 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>75174-I</u>		EPA Receipt Date: <u>6-4-12</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form) a) All inerts (link to http://www.epa.gov/opprd001/inerts/), including fragrances, approved for the proposed uses (see Footnote A)			X		
		yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack) Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)			yes	no	
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
5	Data Matrix (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack) a) Selective Method (Fee category experts use) b) Cite-All (Fee category experts use) c) Applicant owns all data (Fee category experts use)			X		
		yes	no			
6	5 Copies of Label (link to http://www.epa.gov/oppfead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels)			X		

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)			X
8	Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)			X
9	If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)			X
10	Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

NO inerts to review, [REDACTED]
No studies associated w/ this jacket
The data matrix doesn't list guidelines, only lists
the companies who have been offered compensation for their
data - form A530 wasn't filled out.

JB

06/07/12

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to <http://www.epa.gov/oppr001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/oppr001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 6, 2012

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-465646
EPA File Symbol or Registration Number: 75174-I
Product Name: SIS AM 75
EPA Receipt Date: 04-Jun-2012
EPA Company Number: 75174
Company Name: SISHIELD TECHNOLOGIES, INC.

KEVIN KUTCEL
KRK CONSULTING LLC
SISHIELD TECHNOLOGIES, INC.
5807 CHURCHILL WAY
MEDINA, OH 44256-

SUBJECT: Receipt of Application and 75% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has received your application, 75% small business waiver request, and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: A530
ME-TOO;NEW PRODUCT;FAST TRACK;

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If your waiver request is approved, the decision review time period will start on the date of approval. If your waiver request is denied, you will receive an invoice for the outstanding balance.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-6427.

Sincerely,

A handwritten signature in black ink, appearing to be "m. zc", is written over the word "Sincerely,".

Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

{917882H~

This package includes the following

- ☒ New Registration
- ☐ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☒ AD
- ☐ BPPD
- ☐ RD

Risk Mgr. 31

Receipt No.

S-

917882

EPA File Symbol/Reg. No.

75174-I

Pin-Punch Date:

6/4/2012

- ☐ This item is NOT subject to FFS action.

Action Code:

Requested: A530

Granted: A530

Amount Due: \$ 1,159.00

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Team 2 Date: June 6

Remarks: new "MC-Too" Product Registration

